

**REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, claims 1, 3-5, 7-18, 20-24, 26-31, and 33-42 were pending in this application. Claims 1, 18, 24, 31, 37, and 40 have been amended, no claims have been added, and no claims have been canceled herein. Therefore claims 1, 3-5, 7-18, 20-24, 26-31, and 33-42 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. § 103 Rejection, Schneider in view of Cain**

The Office Action has rejected claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,408,336 of Schneider et al. (hereinafter "Schneider") in view of U. S. Patent No. 6,963,573 of Cain et al. (hereinafter "Cain"). The Applicants respectfully traverse the rejection and submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, the references do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for subscribing to and unsubscribing from said first group.

As discussed previously, Schneider is directed to "control of access to data in a distributed environment" (col. 1, lines 32-33) and more specifically to making access filters more



scalable by decentralizing administration of these filters (col. 5, line 66 - col. 6, line 1). More specifically, Schneider discloses three types of policies, an access policy, an administrative policy, and a policy maker policy. (Col. 10, lines 52-54) Schneider defines these policies as follows:

"Policy information is further divided into access policy 307, administrative policy 305, and policy maker policy 306. access policy 307 defines rights of access by user groups to information sets; administrative policy 305 defines rights of user groups to define/delete/ modify objects in VPN 201. Among the objects are access policies, information sets, user groups, locations in VPN 201, servers, and services; and policy maker policy 306 defines rights of user groups to make access policy for information sets." (Col. 10, lines 52-63)

That is, under Schneider, an access policy defines a user's or group's rights to access particular information while the administrative policy defines a user's ability to or rights to modify membership, i.e., defines who has administrative rights to add or remove members. However, as noted previously and as noted in the Office Action, Schneider does not teach or suggest a plurality of policies for subscribing to and unsubscribing from a group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group. The process of adding or removing user to a group under Schneider is then carried out by these designated administrators in a manner similar to that described in the background section of the pending application. In other words, Schneider's administrative policy defines who can act as an administrator, i.e., who can change group membership, but "the administrators who have control over a user group are responsible for correctly defining membership in the user group." (Col. 16, lines 8-11, see also Background of the pending application, page 2, lines 20-28)

Cain is directed to "receiver access control in a multicast communication system." (Col. 1, lines 21-22) Under Cain, "a policy service is used to determine whether a subscriber device can be admitted to a multicast group." (Col. 2, lines 43-45) "The subscriber device accesses the multicast communication network via an access device [and] the access device uses



a policy service to obtain a policy decision from a policy server, where the policy decision indicates whether or not the subscriber device can be admitted to the multicast group." (Col. 2, lines 45-50) That is, Cain teaches a policy for determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network. However, Cain does not teach or suggest accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for subscribing to **and unsubscribing from** said first group.

The combination of Schneider and Cain is no more relevant to the pending claims than either reference alone since neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for subscribing to and unsubscribing from said first group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Cain teaches a policy for determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network.

Claim 1, upon which claims 3-5 and 7-17 depend, claim 18, upon which claims 20-23 depend, claim 24, upon which claims 26-30 depend, claim 31, upon which claims 33-36 depend, claim 37, upon which claims 38-39 depend, and claim 40, upon which claims 41-42 depend, each recite in part "accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for subscribing to and unsubscribing from said first group." Neither Schneider nor Cain teaches or suggests, alone or in combination, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for subscribing to and unsubscribing from said first group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group while Cain teaches a policy for determining whether a subscriber device can be admitted to the multicast group, i.e., allowing or prohibiting access to a multicast network. For at least these reasons, claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 should be allowed.



Appl. No. 09/998,898

PATENT

Amdt. dated: June 7, 2007

Reply to Office Action of March 7, 2007

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Dated: June 7, 2007

Respectfully submitted,

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